

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: DANIEL STIREWALT  
(OCA/USPS-T3-17-24)  
August 18, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

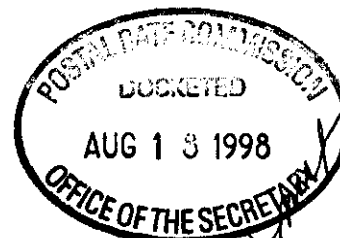
Respectfully submitted,

*Gail Willette*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Shelley S. Dreifuss*

Shelley S. Dreifuss  
Attorney



OCA/USPS-T3-17. Please refer to USPS-LR-1/MC98-1, page 3, where it states,

Postal Service personnel within the existing Postal Service Information Systems Customer Support organization will handle the technical help desk function for Mailing Online.

Please reconcile the statement quoted above with the following statement of witness

Garvey:

For the experimental Mailing Online service (MOL) all customer support, education and training are to be handled through the PostOffice Online Help Desk, a contracted telephone support center. See response to OCA/USPS-T1-6.

OCA/USPS-T3-18. Please refer to USPS-LR-1/MC98-1, page 3.

- a. Please explain the relationship between "the technical help desk function for Mailing Online" and the PostOffice Online Help Desk.
- b. Please confirm that the costs of the PostOffice Online Help Desk related to Mailing Online service are computed separately from the technical help desk function for Mailing Online. If you do not confirm, please explain.
- c. Please confirm that the costs of all customer support, education and training to be provided by the PostOffice Online Help Desk during the experiential Mailing Online service are included in Attachments 1 and 2 of your testimony. If you do not confirm, please provide the costs of all customer support, education and training. If you do confirm, please identify where the costs of all customer support, education and training are accounted for in Attachments 1 and 2.

OCA/USPS-T3-19. Please refer to USPS-LR-1/MC98-1, page 3. Please confirm that the technical help desk function for Mailing Online will be operational during the expanded (market) test. If you do not confirm, please explain.

OCA/USPS-T3-20. Please refer to USPS-LR-1/MC98-1, and the table, Cost Summary, on page 5, revised July 23, 1998. Please provide the following for each "Cost Category" in the table, Cost Summary:

- a. Finance Number;
- b. Cost Account and Subaccount, and;
- c. Budget Authorization Code.

OCA/USPS-T3-21. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years.

- a. Please confirm that the "Technical Help Desk Resource Years" is a subset of "Total Help Desk Resource Years." If you do not confirm, please explain.
- b. Please explain the difference, in terms of activities and responsibilities, between the "Help Desk" and the "Technical Help Desk."
- c. Please explain how the remaining 1.33 (2.66 - 1.33) of "Total Help Desk Resource Years" is related to the Mailing Online service.

OCA/USPS-T3-22. Please refer to USPS-LR-1/MC98-1, Attachment 1, page 11, concerning the Technical Help Desk Resource Years, and Attachment 2, page 12, Technical Help Desk.

- a. In Attachment 2, page 12, Technical Help Desk, in the line "Workstations" for "FIXED COSTS, YR 1999," please confirm that the number 3 in the column, "No. of Units," means that there will be 3 help desk staff members allocated to Mailing Online service in FY 1999, since each help desk staff member requires a computer workstation. If you do not confirm, please explain.
- b. In Attachment 2, page 12, Technical Help Desk, in the line "Workstations" for "FIXED COSTS, YR 1999," please confirm that the number 3 in the column, "No. of Units," means that there will be 3 resource years allocated to Mailing Online service in FY 1999, since one unit equals one resource year. If you do not confirm, please explain.
- c. Please confirm that the number 3 in the column, "No. of Units," found in Attachment 2, page 12, Technical Help Desk, in the line "Workstations" for "FIXED COSTS, YR 1999," is the rounded 2.66 "Total Help Desk Resource Years" found in Attachment 1, page 11, Technical Help Desk Resource Years for "YR 1999 Estimate." If you do not confirm, please explain.
- d. In Attachment 2, page 12, Technical Help Desk, in the line "Workstations" for "ANNUAL COSTS, YR 1999," please confirm that the "Unit Cost" and "No. of Units" should be \$6,000 and 3, respectively. If you do not confirm, please explain.

OCA/USPS-T3-23. Please refer to USPS-LR-1/MC98-1, Attachment 2, page 12, concerning the Technical Help Desk.

- a. In the line "Technical Help Desk Staff," for "ANNUAL COSTS, YR 1999," please confirm you are assuming 3 technical help desk employees will be allocated to Mailing Online service in FY 1999. If you do not confirm, please explain.
- b. In the line "Training for New Hires/Replacements," for "ANNUAL COSTS, YR 1999," please confirm you are assuming training for 2 new hires/replacements. If you do not confirm, please explain.
- c. In the line "Training for New Hires/Replacements," for "ANNUAL COSTS, YR 1999," please confirm that the "Unit Cost" and "No. of Units" should be \$3,000 and 3, respectively. If you do not confirm, please explain and identify where the training costs of \$1,000 for the third technical help desk employee is located in your workpapers.

OCA/USPS-T3-24. Please refer to your response to OCA/USPS-T3-1, page 1 of the "Cost Component Sources/Derivations Worksheet." In row 4, under the column "No. of Units Source/Derivation," it states

Attachment 1 Item 22 Technical Help Desk Resource Years; HD 13, HD 14 = Item #22, rounded to the nearest resource year. Due to the lack of empirical data regarding the amount of customer calls expected, one additional year was added.

For the "YR 1999 Estimate," item #22, Technical Help Desk Resource Years, is 1.33.

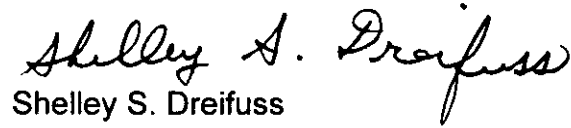
For the "ANNUAL COSTS, YR 1999," HD 13 and HD 14 show 1 Technical Help Desk Manager and 3 Technical Help Desk Staff.

- a. Please identify the figure to which "one additional year was added."

- b. Please explain, and show in mathematical terms, how item #22 and HD 13 and HD 14 are related.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Shelley S. Dreifuss  
Attorney

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